

Engels Tejeda (#11427)
Benjamin D. Passey (#19234)
HOLLAND & HART LLP
222 S. Main Street, Suite 2200
Salt Lake City, UT 84101
Telephone: (801) 799-5800
ejtejeda@hollandhart.com
bdpassey@hollandhart.com

Erik F. Stidham (*Admitted Pro Hac Vice*)
Jennifer M. Jensen (*Admitted Pro Hac Vice*)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-7714
Telephone: (208) 342-5000
efstidham@hollandhart.com
jmmjensen@hollandhart.com

*Attorneys for St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:

AMMON EDWARD BUNDY
Debtor.

Bankruptcy No. 24-23530

Chapter 7

Honorable William T. Thurman

**DECLARATION OF ERIK F. STIDHAM IN SUPPORT OF MOTIONS TO COMPEL
RYAN BUNDY'S AND BUNDY MOTORS COMPANY'S COMPLIANCE WITH
RULE 2004 SUBPOENAS FOR EXAMINATIONS AND PRODUCTION OF
DOCUMENTS**

I, Erik F. Stidham, declare and state as follows:

1. I am a partner in the Boise office of the law firm of Holland & Hart LLP and am licensed to practice law in the State of Idaho. I am admitted to this Court *pro hac vice* for this case. Along with my colleagues identified above, I am counsel for St. Luke's Health System, Ltd.,

St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP (collectively, the "St. Luke's Creditors").

2. I am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

3. I make this Declaration in support of St. Luke's Creditors' Motions to Compel Ryan Bundy's and Bundy Motors Company's compliance with Rule 2004 Subpoenas filed concurrently herewith.

4. Attached hereto as **Exhibit A** is a true and correct copy of a partial transcript of the Rule 2004 Examination of Debtor Ammon Bundy.

5. On February 14, 2025, St. Luke's Creditors mailed First Amended Subpoenas to both Ryan Bundy and Bundy Motors to Ryan Bundy's address in Mesquite, Nevada (61 Riverside Road Mesquite, NV 89027-5905). Attached hereto as **Exhibit B** is a true and correct copy of correspondence to Ryan Bundy dated February 14, 2025. The First Amended Subpoenas required appearance for oral examinations in St. George on March 3, 2025 (Ryan) and March 4, 2025 (Bundy Motors). Each subpoena further required the production of documents by the third parties on the date of each examination.

6. The St. Luke's Creditors' counsel prepared for the examinations, travelled from Boise to St. George for the examinations, and arranged for a videographer and court reporter to attend and make a record of the examinations.

7. On March 2, 2025, a day prior to Ryan's examination on March 3, 2025, counsel for St. Luke's Creditors emailed bundymotors27@gmail.com. Attached hereto as **Exhibit C** is a true and correct copy of the March 2, 2025, email to Ryan Bundy. The email provided Ryan with

copies of the First Amended Subpoenas for both himself and Bundy Motors and reminded him of the upcoming examinations. No response was made to the email.

8. Ryan Bundy failed to appear for his examination on March 3. After the time it was set to begin, counsel for St. Luke's Creditors emailed Ryan Bundy, indicating he and the court reporter were waiting for Ryan Bundy to show up. Attached hereto as **Exhibit D** is a true and correct copy of the email to Ryan Bundy dated March 3, 2025. Ryan Bundy did not respond to the email or show up.

9. Later that day on March 3, counsel for St. Luke's Creditors emailed Ryan Bundy again about the Bundy Motors examination set for the next day. Yet again, no response was provided. Given the entire lack of responsiveness, counsel for St. Luke's Creditors notified the court reporter that the examination for Bundy Motors would need to be reset with assistance from the Court and notified Ryan Bundy of the same on March 4. True and correct copies of these communications are attached hereto as **Exhibit E**.

10. As of the date of this Motion to Compel, neither Ryan Bundy nor Bundy Motors has produced documents responsive to the requests in the First Amended Subpoenas.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 15th day of April, 2025.

/s/ Erik F. Stidham

Erik F. Stidham

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2025, I electronically filed the foregoing with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF user.

Mark C. Rose
McKay, Burton & Thurman, P.C.
trustee@mbt-law.com; UT32@ecfbis.com

David W. Newman
Matthew J. Burne
U.S. Department of Justice
david.w.newman@usdoj.gov; matthew.burne@usdoj.gov;
james.gee@usdoj.gov; lindsey.huston@usdoj.gov; rinehart.peshell@usdoj.gov;
rachelle.d.hughes@usdoj.gov; Brittany.dewitt@usoj.gov

U.S. Trustee
USTPRegion19.SK.ECF@usdoj.gov

George B. Hofmann
ghofmann@ck.law; mparks@ck.law

By U.S. First Class Mail with postage pre-paid:

Ammon Edward Bundy
P.O. Box 1062
Cedar City, UT 84720

Ammon Edward Bundy
896 E 400 S
New Harmony, UT 84757

Ryan Bundy
Bundy Motors Company
361 Riverside Road
Mesquite, NV 89027-5905

By Internet email:

Ammon Edward Bundy
aebundy@bundyfarms.com
aebundy@msn.com

Ryan Bundy
Bundy's Motors Company
bundymotors27@gmail.com

HOLLAND & HART LLP

/s/ Erik F. Stidham

Erik F. Stidham (*Admitted Pro Hac Vice*)

Jennifer M. Jensen (*Admitted Pro Hac Vice*)